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IDAHO PUBLIC  
UTILITIES COMMISSION

Benjamin J. Otto  
ID Bar # 8292  
Energy Associate  
Idaho Conservation League  
PO Box 844, Boise, ID 83701  
Email: [botto@idahococonservation.org](mailto:botto@idahococonservation.org)  
P: 208-345-6933 x 12

Matt Vespa  
CA Bar #222265 (*Pro Hac Vice pending*)  
Sierra Club  
85 Second St., 2<sup>nd</sup> Fl.  
San Francisco, CA 94105  
Email: [matt.vespa@sierraclub.org](mailto:matt.vespa@sierraclub.org)  
P: 415-977-5753  
F: 415-977-5793

*Attorneys for Idaho Conservation League and Sierra Club*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF IDAHO POWER</b>	)	<b>CASE NO. IPC-E-15-01</b>
<b>COMPANY'S PETITION TO MODIFY</b>	)	
<b>TERMS AND CONDITIONS OF</b>	)	<b>PETITION OF SIERRA CLUB TO</b>
<b>PROSPECTIVE PURPA ENERGY SALES</b>	)	<b>INTERVENE AND JOIN PARTIES</b>
<b>AGREEMENTS</b>	)	<b>WITH IDAHO CONSERVATION</b>
	)	<b>LEAGUE</b>
	)	

Pursuant to IDAPA 31.01.01.042, Sierra Club hereby submits this petition to intervene and to join parties with Idaho Conservation League ("ICL") in the above captioned matter. On February 4, 2015, ICL requested leave to intervene in the above captioned matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. On February 6, 2015, in the Commission's Notice of Petition and Notice of Intervention Deadline, Order No. 33222, the Commission granted ICL's intervention. Sierra Club and ICL share many strategic goals and interests and believe it would be most efficient for all parties and the Commission, for Sierra Club to appear and join parties with ICL.

1. Sierra Club is a national, non-profit environmental and conservation organization incorporated under the laws of the State of California. The Sierra Club is dedicated to the protection of public health and the environment. Sierra Club submits this notice to appear and join parties with ICL on behalf of itself and nearly 2,400 Sierra Club members who live and purchase utility services in Idaho, many of whom are residential customers of Idaho Power. The name and address of Sierra Club is:

Sierra Club  
85 Second Street, 2<sup>nd</sup> Floor  
San Francisco, CA 94105

2. Sierra Club's Idaho members have a direct and substantial interest in this proceeding. Idaho Power's January 30, 2015 Application with the Commission seeks to drastically alter terms and conditions of prospective PURPA energy sales agreements by reducing contract length from twenty to two years. Such a change would have a detrimental impact to additional solar deployment in Idaho and limit the environmental, health and economic benefits of decarbonization of the energy system. This proceeding therefore has environment, health and economic consequences for Sierra Club members who are customers of Idaho Power. These Sierra Club members have a right to participate in this proceeding to inform the Commission of their interests, both environmental and economic, that relate to the impacts of modifying prospective PURPA energy sales agreements.
3. Sierra Club's Beyond Coal campaign seeks rapid replacement of fossil-fueled generating units with cleaner forms of energy to eliminate or reduce global climate change emissions, reduce utility bills, and generate renewable energy. Sierra Club's work includes advocating for the implementation of robust incentive programs that assist its members and utility consumers generally to generate their own renewable energy and increase energy efficiency. The Sierra Club's work includes intervening in dockets at public utility commissions nationwide, submitting comments in numerous state and federal agency energy-related proceedings and rulemakings, attending and speaking at public hearings, speaking to students and civic and other organizations, and holding seminars and symposia - all in support of policies to reduce the impact of climate change and other air pollution by promoting clean energy alternatives and energy efficiency.

Sierra Club members have worked tirelessly to promote clean energy alternatives and energy efficiency measures.

4. Sierra Club has a specific interest in this docket because its members who live within Idaho Power's service territory are ratepayers and have a pecuniary and tangible interest in the outcome of the proceeding. Sierra Club members have a direct interest in ensuring fair, accurate rates and charges for clean energy sources in order to foster clean energy development in Idaho Power's service territory. Sierra Club is concerned that the proposed change is needlessly draconian and fails to consider solutions that will allow continued growth of solar in Idaho.
5. Sierra Club and ICL were both recently parties in IPC-E-14-18, In the Matter of Idaho Power Company's Application to Implement Solar Integration Rates and Charges, which ultimately resulted in a settlement. In assessing this proceeding, Sierra Club and ICL determined that joint participation would be more efficient.
6. By joining parties with ICL, Sierra Club will not unduly broaden the issues or delay the proceeding because Sierra Club's interest is directly related to the subjects addressed in Idaho Power's application.
7. Sierra Club's involvement with ICL in this proceeding will not be duplicative of other parties in this proceeding because no other party adequately represents Sierra Club's interests. In fact, joining with ICL is intended to avoid what otherwise would be duplication of efforts.
8. Sierra Club and ICL request that all future pleadings, correspondence, discovery, and other documents be served on the following:

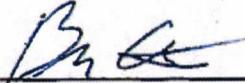
Matt Vespa  
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Sierra Club  
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Email: [matt.vespa@sierraclub.org](mailto:matt.vespa@sierraclub.org)  
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Energy Associate  
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Boise, Idaho 83701  
Email: [botto@idahoconservation.org](mailto:botto@idahoconservation.org)  
P: 208-345-6933 x 12

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WHEREFORE, Sierra Club respectfully requests that the Commission issue an order granting Sierra Club's permission to intervene in this matter and to join parties with ICL.

Dated this 20<sup>th</sup> day of February, 2015



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Benjamin J Otto  
ID Bar #8292  
Energy Associate  
Idaho Conservation League  
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Boise, Idaho 83701  
Email: [botto@idahoconservation.org](mailto:botto@idahoconservation.org)  
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San Francisco, CA 94105  
Email: [matt.vespa@sierraclub.org](mailto:matt.vespa@sierraclub.org)  
P: 415-977-5753  
F: 415-977-5793

*Attorneys for Idaho Conservation League and Sierra Club*

## CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of February, 2015, I caused to be served, via e-mail, a true and correct copy of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

### Hand Delivery:

Jean Jewell  
Commission Secretary  
(Original and seven copies provided)  
Idaho Public Utilities Commission  
42TW. Washington St.  
Boise, ID 83702-5983

### Electronic Mail:

*Idaho Power*  
Donovan E. Walker  
Regulatory Dockets  
Idaho Power Company  
1221 West Idaho Street  
P.O. Box 70  
Boise, ID 83707  
dwalker@idahopower.com  
dockets@idahopower.com

*Avista*  
Michael G. Andrea, Senior Counsel  
Clint Kalich  
Avista Corporation  
1411 E. Mission Ave, MSC-23  
Spokane, WA 99202  
Michael.andrea@avistacorp.com  
Clint.kalish@avistacorp.com

*Rocky Mountain Power*  
Daniel Solander  
Ted Weston  
Rocky Mountain Power  
201 S. Main Street, Ste 2400  
Salt Lake City, UT 84111  
Daniel.solander@pacificorp.com  
Ted.weston@pacificorp.com  
datarequest@pacificorp.com

*J.R. Simplot Corp & Clearwater Paper*  
Peter J. Richardson  
Gregory M. Adams  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> Street  
Boise, ID 83702  
peter@richardsonadams.com  
greg@richardsonadmas.com

Dr. Don Reading  
6070 Hill Road  
Boise, ID 83703  
dreading@mindspring.com

Carol Haugen, Clearwater Paper  
Carol.haugen@clearwater.com

*Twin Falls Canal, Northside Canal,  
American Falls Reservoir District No 2.*  
C. Tom Arkoosh  
Arkoosh Law Offices  
802 W. Bannock St Ste. 900  
P.O. Box 2900  
Boise, ID 83701  
Tom.arkoosh@arkoosh.com  
Erin.cecil@arkoosh.com

*Intermountain Energy Partners*

Dean J. Miller  
McDevitt & Miller LLP  
420 W. Bannock Street  
PO Box 2564-83701  
Boise, ID 83702  
joe@mcdevitt-miller.com

Leif Elgethun, PE, LLE AP  
Intermountain Energy Partners  
PO Box 7354  
Boise, ID 83707  
leif@sitebasedenergy.com

*Idaho Irrigation Pumpers Association*

Eric L. Olsen  
Racine, Olson, Nye, Budge & Bailey,  
Chartered  
P.O. Box 1391  
201 E. Center  
Pocatello, ID 83204  
elo@racinelaw.net

Anthony Yankel  
29814 Lake Road  
Bay Village, OH 44140  
tony@yankel.net

*Idaho Conservation League & Sierra Club*

Benjamin J. Otto  
Idaho Conservation League  
710 N.6th St.  
Boise, Idaho 83702  
botto@idahoconservation.org

Matt Vespa  
Sierra Club  
85 Second St., 2<sup>nd</sup> Fl.  
San Francisco, CA 94105  
matt.vespa@sierraclub.org

*Snake River Alliance*

Kelsey Jae Nunez  
Ken Miller  
Snake River Alliance  
223 N. 6<sup>th</sup> St., Ste. 317  
PO Box 1731  
Boise, ID 83701  
knunez@snakeriveralliance.org  
kmiller@snakeriveralliance.org



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(sender of service docs)